



OFFICE OF THE CHIEF COUNSEL

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

October 16, 2020

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Release Date: 12/31/2020

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Dear _____ :

I apologize for the delay responding to your inquiry dated May 11, 2020. You explained you took your required minimum distribution (RMD) in January 2020 and asked if you can roll over the RMD back to your IRA.

Generally, an IRA owner has 60 days from the IRA distribution other than an RMD to roll over that amount to an IRA or other eligible retirement plan. However, Section 2203 of the CARES Act of March 27, 2020 waived all RMDs for the 2020 calendar year. Therefore, individuals can roll over an amount that would otherwise have been an RMD paid from an IRA in 2020.

On June 23, 2020, we issued Notice 2020-51 to extend the deadline to roll over any 2020 RMD paid in January 2020 to August 31, 2020. Notice 2020-51 also allowed individuals to repay amounts equal to the 2020 RMD into the IRA from which it was distributed. That repayment was not treated as a rollover for purposes of the "one rollover per year" rule. For your convenience, I have enclosed a copy of Notice 2020-51.

I hope this information is helpful. If you have any additional questions, please contact me at _____ or _____, at _____.

Sincerely,

Laura B. Warshawsky
Branch Chief, Qualified Plans Branch 1
(Employee Benefits, Exempt Organizations,
and Employment Taxes)

Enclosure